REMARKS

The amendment and Rule 132 Declaration filed January 29, 2008, after final Office Action, was not entered.

Claim 1 has been amended as supported by the Examples of the specification which use Teonex (page 14, line 6 of the specification) for the intermediate layer which is a non-porous material as further evidenced by the attached **new Rule 132 Declaration**.

Claims 1-8 and 13-19 are active in this application.

Applicants wish to thank Examiner Zimmer for the helpful discussion on December 27, 2007.

It was noted that Okami has only a general disclosure of adhesives but does not disclose or suggest the claimed silicon compound based adhesion imparting agent d) having the claimed functional groups. The Examiner appeared to agree that he did not make out a proper prima facie case of obviousness.

Further, it was suggested to include in Claim 1 that the intermediate layer is "non-porous". The Examiner was questioning whether the materials used for the intermediate layers in the Examples of the specification (for example: Kapton 100H, Teonex, Nittoflon 902UL) are porous or non-porous. As shown in the attached **new Rule 132 Declaration (and the Rule 132 Declaration filed January 29, 2008),** Teonex is non-porous. Applicants have performed SEM measurements showing that Teonex is non-porous. Accordingly, the Examiner should accept that there is support for claiming that the intermediate layer is "non-porous".

The present invention as set forth in **amended Claim 1** relates to a heat conductive silicone rubber composite sheet, comprising:

a laminated structure with an intermediate layer and a pair of outer layers laminated to both surfaces of said intermediate layer, wherein

(A) said intermediate layer is a layer of a synthetic resin film that displays heat resistance and electrical insulation **and said intermediate layer is non-porous**, and

(B) said outer layers are silicone rubber layers formed by curing a composition comprising (a) an organopolysiloxane, (b) a curing agent, (c) a heat conductive filler, and **(d) a silicon compound-based adhesion imparting agent with at least one functional group selected from the group consisting of epoxy groups, alkoxy groups, vinyl groups, and the group represented by the formula Si–H;**

wherein said curing agent of said component (b) is an organic peroxide.

Okami et al fail to disclose or suggest **(d) a silicon compound-based adhesion imparting agent with at least one functional group selected from the group consisting of epoxy groups, alkoxy groups, vinyl groups, and the group represented by the formula Si–H.**

Okami et al. (U.S. Patent 6,074,963) discloses a thermally conductive composite sheet comprising a porous reinforcing material layer and a cured silicone rubber layer prepared from a silicone rubber composition containing (a) an organopolysiloxane, (b) an organohydrogen polysiloxane, (c) a platinum group metallic catalyst and (d) a thermally conductive filler. However, Okami et al. is silent as to including in said composition a silicone compound-based adhesion imparting agent having the specified functional group, i.e. component (d) of the composition of the present invention.

The present inventors have conducted a comparative experiment as shown in the **previously filed Rule 132 Declaration (August 14, 2007)**. In place of the silicone composition of Example 1 of the present application, the liquid addition curing silicone rubber composition described in Example 1 of Okami et al. (which is only the one composition actually disclosed therein) was applied similarly to Example 1 of the present application to both surfaces of each of the aromatic polyimide-based film and the polyethylene naphthalate-based film used in Example 1 and 3, respectively, of the present application to prepare heat conductive silicone rubber composite sheets.

As a result, it has been found that the silicone rubber layer formed from the liquid addition curing silicone rubber composition of Example 1 of Okami et al. scarcely adheres to any of the aromatic polyimide-based film and the polyethylene naphthalate-based film (see Table A in the Comparative Experiment).

In contrast thereto, the silicone composition of Example 1 of the present application containing an adhesion imparting agent (d) adheres to both of aromatic polyimide-based film and the polyethylene naphthalate-based film with an adhesion strength of 39.2 N/cm and 41.2 N/cm, respectively, as shown in Table 1 of the present specification (See also Rule 132 Declaration). It is apparent that **the liquid addition curing silicone rubber composition of Okami et al. is usable only for adhesion of porous material layers and not for non-porous material layers while the silicone composition of the present invention is usable for adhesion of both of porous layers and non-porous layers**.

Therefore, the rejection of Claims 1-8 and 13-19 under 35 U.S.C. § 103(a) over Okami et al is believed to be unsustainable as the present invention is neither anticipated nor obvious and withdrawal of this rejection is respectfully requested.

This application presents allowable subject matter, and the Examiner is kindly requested to pass it to issue. Should the Examiner have any questions regarding the claims or otherwise wish to discuss this case, he is kindly invited to contact Applicants' below-signed representative, who would be happy to provide any assistance deemed necessary in speeding this application to allowance.

Respectfully submitted,

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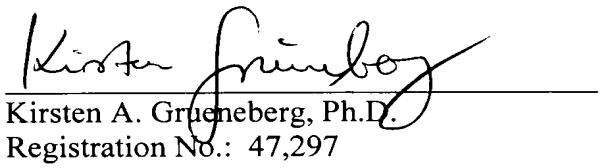

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